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REMARKS

In the Advisory Action mailed March 4, 2004, the Examiner maintained the final rejection of claims 15 and 25 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 3,741,057 (hereinafter Maschinot); maintained the objection to claims 16-24 and 26-28; and refused entry of new claim 29. With this reply, Applicants have added a new claim 30, which corresponds to unentered claim 29, and a new claim 31, which essentially incorporates subject matter similar to that of claims 15 and 16 in independent form. As such, Applicants request non-entry of Applicant's Amendment and Reply under 37 C.F.R. §1.116 that was previously filed on February 19, 2004, adding claim 29 (i.e., non-entry of claim 29 be maintained). Applicants submit that all of claims 15-28, 30 and 31 are allowable over the prior art of record.

At the outset, Applicants believe that a brief review of their claimed subject matter may help to advance this case toward allowance. Applicants' independent claim 15 is directed to a device for die-cutting a stack of sheet materials. The device includes a frame for receiving and retaining a die-cutter blade, which is adjustable relative to the frame. The frame is received and retained within a receiving apparatus that is adjustably mounted to a punch platen.

With reference to Applicants' Fig. 10, the frame 16 is shown with a die-cutter blade 18 retained therein. With reference to Applicants' Fig. 5, the frame 16 is shown positioned between parallel gibs 14 and 15 of the receiving apparatus 13, which is adjustably mounted to the punch platen 12. With reference to Applicants' Fig. 4, the receiving apparatus 13, which is adjustably mounted to the punch platen 12, is shown receiving the frame 16. It should be appreciated that the receiving apparatus 13, which is adjustably mounted to the punch platen 12, readily receives the frame 16, which already includes a die-cutter blade 18 properly positioned within the frame 16.

In contrast, Maschinot discloses a device for die-cutting, where a die-cutting blade is adjusted within the device for die-cutting. The Maschinot chuck jaws 30 are movable to allow for positioning of a die-cutter blade. However, the Maschinot chuck jaws 30 are secured to the

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underside of the lower plate 20 and are incapable of retaining a die-cutter blade absent their attachment to the lower plate 20.

The present Advisory Action states, in part, that "[t]he chuck jaws 30 which is located on both sides of the die-cutting blade also include the guides 29, which hold the chuck jaws 30. The chuck jaws 30 cannot be extended without the support of the guides 29. The guides 29 and the chuck jaws 30 are stationary relative to the lateral movement of the die-cutter blade. Therefore, the die-cutting blade is also adjustable relative to the guides 29 of the frame 30, since the guides 29 are stationary, with respect to the die-cutting blade. See col. 2, lines 22-55 in Maschinot." However, this rationale misses the point. More specifically, the guides 29 are affixed to the lower plate 20. In fact, Maschinot, column 2, lines 40-41, states "[s]ecured to the underside of the plate 20 are guides 29 for the chuck jaws." Applicants agree that the chuck jaws 30, which are located on four sides of the die-cutting blade, are positioned within the guides 29, which support the chuck jaws 30. Applicants further agree that the guides 29 of the chuck jaws 30 are stationary relative to the movement of the die-cutter blade.

However, Applicants submit that the guides 29 cannot be both part of a frame for receiving a die-cutter blade and also part of a receiving apparatus. More specifically, the Office Action states that "[t]he frame 30 is disposed inside its guide 29 and guide 29 is secured to underside of the receiving apparatus 20. Therefore, the frame 30 is part of the receiving apparatus 20 and it is received and retained by the receiving apparatus 20." However, Applicants submit that the chuck jaws 30, by themselves, cannot form a frame as they are not connected to each other and can only form a frame in combination with the lower plate 20 and the guides 29. More specifically, when the chuck jaws 30 are attached to the lower plate 20, the combination of the lower plate 20, the chuck jaws 30, and their associated guides 29 retain a die-cutter blade. This does not teach or suggest a device for die-cutting a stack of sheet materials that includes a frame for receiving and retaining a die-cutter blade, which is adjustable relative to the frame, and a receiving apparatus that is adjustably mounted to a punch platen that receives and retains the frame. As such, Applicants submit that

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independent claims 15, 30 and 31 are allowable. Further, Applicants submit that dependent claims 16-28 depend upon an allowable claim and are also allowable for at least this reason.

CONCLUSION

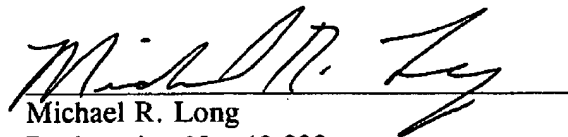
For all of the foregoing reasons, Applicants respectfully submit that claims 15-28 and 30-31 are allowable. The undersigned respectfully requests a telephonic conference with the Examiner prior to issuance of an Office Action on Applicants' Request for Continued Examination. The undersigned can be reached at (616) 949-9610.

Respectfully submitted,

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